



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

John Doe
Plaintiff(s)

vs.

Defendant(s)
Cornell University, William Carpenter, et al.

Civil Case No.: 3:19-cv-1189 (BKS/ML)

**CIVIL COMPLAINT
PURSUANT TO
TITLE VII OF THE
CIVIL RIGHTS ACT,
AS AMENDED**

Plaintiff(s) demand(s) a trial by: JURY COURT (Select **only** one).

JURISDICTION

1. Jurisdiction is conferred on this court pursuant to 42 U.S.C. § 2000e-5.

PARTIES

2. Plaintiff: John Doe

Address: 757 Warren Rd., Unit#4554, Ithaca, NY-14852

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Cornell University

Official Position: _____

Address: 300 Day Hall, Cornell University, Ithaca, NY-14853

Telephone: 607-255-5201

b. Defendant: Lance R Collins
 Official Position: Dean of Engineering
 Address: Rm#242, Carpenter Hall, Cornell University, Ithaca
NY-14853
 Telephone: 607-255-9679

4. This action is brought pursuant to:

Title VII of the Civil Rights Act of 1964, as amended, codified at 42 U.S.C. § 2000e *et seq.*, and the Civil Rights Act of 1991, for employment discrimination based on race, color, religion, sex or national origin.

Pregnancy Discrimination Act of 1978, codified at 42 U.S.C. § 2000e(k), as amended, Civil Rights Act of 1964, and the Civil Rights Act of 1991, for employment discrimination based on pregnancy.

5. Venue is invoked pursuant to 28 U.S.C. § 1331.

6. Defendant's conduct is discriminatory with respect to the following (check all that apply):

(A) My race or color.
 (B) My religion.
 (C) My sex (or sexual harassment).
 (D) My national origin.
 (E) My pregnancy.
 (F) Other: Disability, veteran status, and ethnicity.

7. The conduct complained of in this action involves:

(A) Failure to employ.
 (B) Termination of employment.
 (C) Failure to promote.
 (D) Unequal terms and conditions of employment.
 (E) Reduction in wages.
 (F) Retaliation.
 (G) Other acts as specified below:
Wrongful termination of student status, harassment, stalking,
Privacy violation, due process, conspiracy, so forth

8.

FACTS

Set forth the facts of your case which substantiate your claims. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

See attached

9.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Illegal discrimination in employment, education, and housing based upon my gender

race, color, religion, sex, national origin, disability, veteran status, and ethnicity

SECOND CAUSE OF ACTION

Retaliation for exercising my Constitutional rights.

THIRD CAUSE OF ACTION

Failure to provide a due process.

10. I filed charges with the New York State Division on Human Rights, the New York City Commission on Human Rights or Equal Employment Opportunity Commission regarding the alleged discriminatory acts on or about:

06/26/2019

(Provide Date)

11. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter (copy attached) which was received by me on or about:

06/27/2019

(Provide Date)

12. The plaintiff is an employee within the meaning of 42 U.S.C. § 2000e(f).

13. The defendant(s) is (are) an employer, employment agency, or labor organization within the meaning of 42 U.S.C. § 2000e(b), (c), or (d).

14. The defendant(s) is (are) engaged in commerce within the meaning of 42 U.S.C. § 2000e(g).

15. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

Compensatory and punitive damages as determined by the Jury and the court, and
cost and disbursement.

Re-instate my student status, and student-employment status back.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 09/23/2019

John Doe

John Doe

Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010